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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DWIGHT MANLEY,

Plaintiff,

v.

MGM RESORTS INTERNATIONAL; MGM
GRAND HOTEL, LLC,

Defendants.

Case No. 2:22-cv-01906-MMD-DJA

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO FILE
SECOND AMENDED COMPLAINT
(First Request)**

Pursuant to LR IA 6-1, LR IA 6-2 and LR 7-1, Plaintiff DWIGHT MANLEY (“*Plaintiff*”) and Defendants MGM RESORTS INTERNATIONAL and MGM GRAND HOTEL, LLC (“*Defendants*”), hereby submit this Stipulation To Extend Time To File Second Amended Complaint as directed in this Court’s Order (ECF #28). This is the parties’ first request related to this Court’s Order (ECF #28). For good cause shown below, the relief requested in this Stipulation will permit a reasonable amount of additional time for Plaintiff to file his Second Amended Complaint.

Good cause exists for this extension to permit Plaintiff to include the categories of information discussed in the Court’s Order (ECF #28). The parties in this case have begun discovery and, more specifically, Plaintiff is currently in receipt of Defendants’ initial set of discovery responses. The requested extension will permit Plaintiff an opportunity to most

efficiently set forth his amended allegations in the forthcoming Second Amended Complaint. In addition, counsel for Plaintiff has pre-existing schedule conflicts during the weeks of June 5 and 12, 2023, which create logistical challenges with the current June 15, 2023 deadline.

The parties request this extension as a professional courtesy to the logistics of these scheduling conflicts and hereby submit that this request is not for any purposes of undue delay.

Accordingly, the parties stipulate to the following schedule as follows:

Plaintiff will file his Second Amended Complaint on or before July 7, 2023.

This stipulation is without prejudice to or waiver of any parties' rights and arguments with respect to the foregoing forthcoming pleading.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully request that this Court endorse the foregoing stipulation and make it the Court's own order.

STIPULATED AND AGREED BY ALL PARTIES.

Dated: June 7, 2023.

By: /s/ Jason D. Smith

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IT IS SO ORDERED



United States District Judge

Dated 6/8/2023